

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

|                                 |   |  |
|---------------------------------|---|--|
| JOHN F. VODOPIA,                | ) | CASE NO. 1:07CV06214                       |
|                                 | ) |  |
| Plaintiff,                      | ) | JUDGE BARBARA S. JONES                     |
|                                 | ) |  |
|                                 | ) | MAGISTRATE JUDGE DEBRA C. FREEMAN          |
|                                 | ) |  |
| vs.                             | ) | <b>PHILIPS ELECTRONICS NORTH AMERICA</b>   |
|                                 | ) | <b>CORPORATION'S MOTION TO REMOVE</b>      |
|                                 | ) | <b>PLAINTIFF'S COMPLAINT FROM PUBLIC</b>   |
|                                 | ) | <b>VIEWING OR ACCESS, TO PROHIBIT</b>      |
| KONINKLIJKE PHILIPS ELECTRONICS | ) | <b>FURTHER PUBLIC DISSEMINATION OF</b>     |
| N.V., <i>et al.</i> ,           | ) | <b>COMPLAINT BY PLAINTIFF, AND TO SEAL</b> |
|                                 | ) | <b>COMPLAINT AND SEAL THE RECORD</b>       |
| Defendants.                     | ) | <b>PENDING FURTHER ACTION BY THE</b>       |
|                                 | ) | <b>COURT</b>                               |
|                                 | ) |  |
|                                 | ) | <b>(EXPEDITED CONSIDERATION REQUEST)</b>   |

**TO:** Raymond Nardo, Esq.  
129 Third Street  
Mineola, NY 11501  
Attorney for Plaintiff

**COUNSEL:**

**PLEASE TAKE NOTICE** that on a date to be scheduled by the United States District Court for the Southern District of New York, Defendant Philips Electronics North America Corporation shall move before The Honorable Judge Barbara S. Jones for an Order removing Plaintiff John F. Vodopia's Complaint from public viewing or access, prohibiting further public dissemination of the Complaint by Plaintiff John F. Vodopia, and sealing the record pending further action by the Court.

**PLEASE TAKE FURTHER NOTICE** that Defendant Philips Electronics North America Corporation shall request that The Honorable Judge Barbara S. Jones and this Court give expedited consideration to this Motion.

**PLEASE TAKE FURTHER NOTICE** that in support of this application Defendant Philips Electronics North America Corporation shall rely upon the accompanying Memorandum, which is incorporated herein by reference.

Respectfully submitted,

s/ Jennifer Rygiel-Boyd  
Jennifer Rygiel-Boyd (JR 5676)  
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Attorney for Defendant  
Philips Electronics North America Corporation

**CERTIFICATE OF SERVICE**

I hereby certify that on September 19, 2007, a copy of the Philips Electronics North America Corporation's Motion to Remove Plaintiff's Complaint from Public Viewing or Access, to Prohibit Further Public Dissemination of Complaint by Plaintiff, and to Seal Complaint and Seal the Record Pending Further Action by the Court was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

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